

REMARKS/ARGUMENTS

Various claims are being amended as shown above. The claim amendments clarify the claim language and are not intended to limit the scope of the claims, unless the claim language is expressly quoted in the following remarks to distinguish over the cited art.

In section 2 the office action, claims 1, 3-6, 10, 12-15, 19 and 21-25 were rejected under 35 U.S.C. 102(e) as being anticipated by Ogus (U.S. Patent No. 6,587,875).

Applicant respectfully traverses the rejection.

Ogus is directed to a protocol that a first computer to send messages to a second computer, while increasing the send rate of the messages until link saturation is detected. As shown in Figures 2-3, messages are sent via Ethernet network. As shown in Figure 6, messages are sent via Internet network. As shown in Figure 9, messages are sent via a peer-to-peer communication network. Therefore, the messages are not sent via shared memory links.

Independent claim 1 distinguishes over the Ogus at least by reciting, a method wherein the "plurality of links comprises shared memory links for transmitting memory requests and memory responses between the processor cells, and wherein the link connects a high bandwidth integrated circuit of the one processor cell with another high bandwidth integrated circuit of another processor cell," and such recited features are not disclosed or suggested by Ogus.

Accordingly, claim 1 is patentable over Ogus.

Claims 10 and 19 are patentable over Ogus for the similar reasons discussed above.

Claims 3-6, 12-15, and 21-25 depend from various ones of claims 1, 10, and 19, and are each patentable over Ogus for at least the same reasons that respective base claim is patentable over Ogus.

Each of the claims 3-6, 12-15, and 21-25 further distinguishes over Ogus by reciting additional features.

Accordingly, each of the claims 3-6, 12-15, and 21-25 is patentable over Ogus.

For the above reasons, Applicants request reconsideration and withdrawal of this rejection under 35 U.S.C. §102.

In the office action, claims 2, 7-9, 11, 16-18, 20 and 26-28 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ogus (U.S. Patent No. 6,587,875), in view of Dally, et al. (U.S. Patent No. 6,370,145). Applicant respectfully traverses the rejection.

The Examiner correctly admits in the office action that Ogus does not specifically disclose a symmetric multiprocessor system, and does not specifically disclose choosing a second link from said plurality of links when a first link of said plurality of links does not provide sufficient bandwidth to perform said network operation, and does not specifically disclose suspending said network operation when said link of said plurality of links is not providing sufficient bandwidth to perform said network operation and resuming said network operation when said link of said plurality of links provides sufficient bandwidth to perform said network operation. In an attempt to overcome the deficiency of Ogus, the Examiner relies on Dally in an attempt to show various features.

Claims 2, 7-9, 11, 16-18, 20 and 26-28 depend from various ones of claims 1, 10 and 19 and are each patentable over the combination of Ogus and Dally for at least the same reasons that their respective base claim is patentable over the cited references, considered singly or in combination.

Furthermore, each of the claims 2, 7-9, 11, 16-18, 20 and 26-28 distinguishes over the combination of Ogus and Dally by reciting additional features.

Furthermore, it would not have been obvious to combine Ogus and Dally as suggested in the office action because the combination would require a substantial reconstruction and redesign of the elements disclosed in the primary reference. (See MPEP 2143.01). For example, there is no suggestion in the references on how to modify the elements in the references so that the network of Ogus can work with the elements disclosed in Dally. Furthermore, the references do not suggest nor disclose any interface circuitry, modules, systems, methods, and/or techniques that permit the network of Ogus to work with the elements disclosed in Dally. Therefore, the combination of Ogus and Dally is improper.

Furthermore, it would not have been obvious to combine Ogus and Dally as suggested in the office action because Ogus teaches away from the features recited in the claims. Specifically, Ogus already provides a data rate adjustment mechanism that is responsive to link saturation. Therefore, Ogus teaches away from the necessity of using shared memory links to perform the network operations.

Accordingly, claims 2, 7-9, 11, 16-18, 20 and 26-28 are each patentable over the combination of Ogus and Dally.

For the above reasons, Applicant requests reconsideration and withdrawal of this rejection under 35 U.S.C. §103.

New claims 29-37 are being added and each recites features that are not disclosed nor suggested by Ogus and Dally, considered singly or in combination.

For the above reasons, Applicants respectfully request allowance of all pending claims.

If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is respectfully requested to specifically point out where such teachings may be found.



10007439-1

CONTACT INFORMATION

If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (805) 681-5078.

Date: April 8, 2005

Respectfully submitted,
Brendan A. Voge

By: Arnold M. de Guzman
Attorney for Applicant(s)
Reg. No. 39,955
805.681.5078
805.681.5076 (FAX)

Please send correspondence to:

**IP Administration
Legal Department, M/S 35
HEWLETT-PACKARD COMPANY
P.O. Box 272400
Fort Collins, CO 80527-2400**

CERTIFICATE OF MAILING

I hereby certify that this correspondence, including the enclosures identified herein, is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below. If the Express Mail Mailing Number is filled in below, then this correspondence is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service pursuant to 37 C.F.R. 1.10.

Signature:			
Typed or Printed Name:	Arnold M. de Guzman, Reg. No. 39,955	Dated:	April 8, 2005
Express Mail Mailing Number (optional):			